RECEIVE AUG 27 2 BY M	UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI DIVISION  A I I I I I I I I I I I I I I I I I I
	6.#363936
Plainti	above the full name of the  ff(s) in this action. Include prison ation number(s).)
Dire	v. ) Case No.  Ctor, Troy Steeler wurden, Null ) (To be assigned by Clerk)
	Morris-Sgt., William Mekenney) Tomry
(Enter ant(s) i require include listing of	All Co.'s who reported to 3 HU/6-wind above the full name of ALL Defending in this action. Fed. R. Civ. P. 10(a) sthat the caption of the complaint the names of all the parties. Merely one party and "et al." is insufficient.  attach additional sheets if necessary.  They 23rd, 2011 for 25.1 COV
	PRISONER CIVIL RIGHTS COMPLAINT UNDER 42 U.S.C. § 1983
I.	PLACE OF PRESENT CONFINEMENT: Exstern Diagnostic Correctional Center, 2727 Hwy. K., Bonne Terre, MO. 63628
II.	PREVIOUS CIVIL ACTIONS:
	A. Have you brought any other civil actions in state or federal court dealing with the same facts involved in this action or otherwise relating to your confinement?
	YES [ <b>≻</b> ] NO [ ]

	В.	If your answer to "A" is YES, describe the action(s) in the space below. If there is more than one action, you must describe the additional action(s) on a separate piece of paper, using the same format as below.			
		1. Parties to previous civil action:			
		Plaintiff(s): Williamson			
		Defendant(s): Manach, etal,			
		2. Court where filed: Mestern District of Missouri, St. Joseph Division			
		3. Docket or case number: 11-6019-CV-3J-G.A.FP			
		4. Name of Judge: Gary A. Fenner			
		5. Basic claim made: None at the Current Moment due to lack of			
		education. Supreme Court Case in support rule:			
		Cruz v. Beto, 405 U.S. 319, 322 [1972][Citations Omitted]			
		6. Present disposition (Is the case still pending? Is it closed? If closed, was it appealed?):			
		Still pending			
III.	GRIE	EVANCE PROCEDURES:			
	A.	Is there a prisoner grievance procedure at the institution in which you are incarcerated?			
		YES [∞] NO [ ]			
	B.	Have you presented this grievance system the facts which are at issue in this complaint?			
		YES [∞] NO [ ]			
		_2_			

	C.	If your answer to "B" is YES, what steps did you take: LR.R No one responded:
		Inschion by prison official's: Title 42 USCS 3/9976, I.E.
	D.	Particular Circumstances Constituting Exhaustion: Taylor v. Barnett (2000, ED Va) 100 F. Supp 2d. 483. [Citatian comitted].  If your answer to "B" is NO, explain why you have not used the grievance system:
IV.	PART	TIES TO THIS ACTION:
17.	,	
	A.	Plaintiff(s)  1. Name of Plaintiff: Lamout Williamson
		E.R.P.C.C., 2727 Hovy K.,  2. Plaintiff's address: Power Terre, MO. G.X.28
		3. Registration number: 363930
		4. Additional Plaintiff(s) and address(es):
	B.	Defendant(s)
		1. Name of Defendant: Director
		2. Defendant's address: 2729 Plaza Dr., Jefferson City MO. 65/02
		3. Defendant's employer and job title: He is the employer/Head.
		He's the "Director". [what the !?]
		4. Additional Defendant(s) and address(es): Wirden-Troy steele, Dr. William Mekenney
Sgt. morris,	C.C.m	William Milam Nurse Tean Nurse Tames Nurse Popin Nurse Casen.
COT NOIL !	11 Cor	rectional Staff that reported to Housen Unit 3/B-wing on response to
'S and warde	w s Tro	rectional Staff that reported to Housen Unit 3/8-wing on response to rize physical altercation on May 23rd, 2011. [See kite reference thier Name of steele response]3-

Section III.C.

Inaction by prison officials:

If inmate had aftempted to use administrative grievance procedure within 30-day time limit [15-day time limit], as claimed, but received no response, such that he was unable to appeal because of regulation requiring written resulction of claims before appeals process could be used, then inmate would have exhausted his available administrative remedies, as required by 42 USCS + 1994 c(a). Taylor v. Ben Barnett (2000, ED VA) 105 F Supp 2d 483.

Girievance from C.C.A Kathy Dillon. I request "4" I.R.R.S.

[Girievance 1st Stage form]. The C.C.A denied me the extra

three forms. Occording to policy, D5-3.2, That is a violation.

Occordingly to D5-32 Offender Girievance F. Abuse/misuse

of the Offender Girievance Procedure: 4, 4. (1) and (2)

(1) The Superintendant may issue a letter of Caution or may limit the Offender to two new complaint per week for a maxim duration of 90 days with a letter of Elimited filing Status. I am not one of those indiviguals, your honor.

Continue of page \$3

Cont. Section III C. (2)

(2) Subsequent restrictions must be approved be by the division director/designee and should be for no more than a 90 day duration.

C.C.A Kathy Dillow refused to give me another I.R.R.S

even after I explained the Emergency Situation. I filed the I.R.R. on June 14th, 2011. I have not received a response. Staff (defendants) failed to timely responsed to complaint, occording to policy and procedure of the Missouri Department of Correction and PL.R.A. guidelines. It's been over 49 daies and Counting. (08/01/11) Note: I requested another Con Grievance but it took 2 weeks to get it. The time limit elapsed for filing [15 day time limit] due to Staff's reglection to do the weekly rounds. I filed and is in the process of completing it now. The Issue is: A Offender Abuse by staff. Designee's fail to timely respond to a c Emergency Complaint in the time limit designated by Policy and Procedure. The time limit is I-day response time limit for designee to respond. This issue is being brought befor them now. Lsee attach Grievance Appeal P.C.C. -11-659.

٧.

CO	UNSEL
A.	Do you have an attorney to representy ou in this action?
	YES [ ] NO [≻]
В.	If your answer to "A" is NO, have you made an effort to contact an attorney to represent you in this matter?
	YES [∞] NO [ ]
C.	If your answer to "B" is YES, state the name(s) and address(es) of the attorneys you contacted and the results of those efforts:
	1) No Attorney's work after 5:00 p.m. 2.1 I am only allowed to make phone
	calls after 7:00 p.m. 3.) Plaintiffs in expirence with aftroneys and
	the field of bisness is 0% precent: I have not received any correspondence.
D.	If your answer to "B" is NO, explain why you have not made such efforts:
E.	Have you previously been represented by counsel in a civil action in this Court?
	YES [ ] NO [∞]
F.	If your answer to "E" is YES, state the attorney's name and address:

VI. STATEMENT OF CLAIM [ state as briefly as possible the facts of your case. Describe how each defendant is involved. Must state exactly what each defendant personally did or did not do, which resulted in harm to you. Include the names of others involved, dates, places. Be pas specific as possible. ....]; Numbered Claims

Assault and Battery / Mal Practise

1.) Assault 2.) Batter 3.) Misuse of Force 4.) Endangerment 5.) Failure to Protect 6.) Abuse of Offender

7) Offender Abuse: Failure to Report Offender Abuse

8.) Neglection of Duties [these all are by Correctional

Officers and/or Warden Tray Steel]

9.) Medical Neglect 10.) Stander 11.) Refusal to treat Patient 12.) Mal Practise 13.) Failure to Report Mal Practise. 14.) Refusal to allow medical treatment by Dr. William McKenney [9-13 are by medical designee Staff members]. [see <u>Definitions</u> for clearity for Numbered (D.#1 or N.#1) defendants. In reference to reason to why they are not vividly identified see exhibit A and exhibit B].

15.) Conspiracy: [I am utterly unable to investigate this Claim. As a offender I am prehibite by the D.O.C. to gather any type of information by truth verification methods and equipment. See D.O.C. Table of Content.

# VI. Claims Place, Date, Statous, Injuries

The <u>Hets took place at</u>;
Potosi Correctional Center
11593 State Highway O
Mineral Point, MO. 63660

The Date of occurrence took on and till: MAY \$23rd, 2011 — [Transferred] October 25th \$2011 [& to E.R.D. C. C.]

Injuries:

1.) Busted Mouth. 2.) Bloody Nose. 3.) Vivid DiscolorItion to my right, inver bicep. 4.) Slight DiscolorItion to my right side of my face. 5.) Poisoning

Still occurring effects 6.) Destruess to right ear:

Still current 7.) Decaing (Rotting eright ear canal:

Symptoms: extremely foul smell (Rot), Puss build-up,

possible blooding [there will be a civil action suit

Against E.R.D. C.C. to follow this one]. . Still accur
ing. [seeking treat at a different facility].

### VI. Clyims

## Murses who treated me from May 24th - June 3rd, 2011

Nurse Holly - she forgot to dress my bicep. (3) She great when dressing my head. (3) Nurse Robin - She was the Morsell She didn't dress my bicep & + Ill. And even the nurse complained about how my head dressing was utterly unprotessional [castalerable]...[ she was to busy grinding her booty ON the CO.S penis at that time ... Nurse Pam - Did & poor job the first time. Called my head & "egg". "Its like rapping I agg." Did pretty good low the second time. Nurse Casey - She improved as time progressed. I constently had to remind her shout my yrm. Stood by After 3rd to see what She do. She forgot!! @@@ Nurse #1 - She didn't ever put woulf gouze Ground my head. And she didn't dress my yom. And on shift or her brake the female walked of the office with & Red bull beer. [what type of facility is this!!?!] pg. 5,-2.

VI. Clyim

Additional Claim

Neglection of Duties Enidanger ment of a Offender

[The Sqt. who wrote read/served the Conduct Violation Name is: Sqt. Morris]

Sqt. Morris for ant to research ask me if

Sgt. Morris torgot to request JSK me if I need P.C. and submit & P.C. Request referr-

y(,

Witness to this

1. C. C.M. DUNIN: ON JUNE 2012, 2011

deprox time: 7:20 A.M. C.C.M. Dunie reported to my cell

with a Displanary Heaving form. I informed mr. Dunin

that I never was given a P.C. request form [Protective

Custody form] by the Sat. during my CDV heaving.

Mr. Duniai inform me that, And I gost: "They

we'er suppose to..."

At that hearing I requested RIO Emmerson as a every and request P.C. because Emmerson has family at that camp and is a known Crip gang member. He documented all of that intermation.

Every time Dr. William McKenney reported to my enfurmary cell, Co. I Brenum, was there. She is a direct eye witness to his refusals!

And she never reported Offerider Abuse,
Medical Neglect, Refusal to treat I patient,
Devial of treatment to a patient, Mal
Practise, or land Refusal to allow treatment, Slander, and Poisoning of a
patient...

She commended him. Allowed him to do it. She Approved of his Conduct and behavior.

Other Injuries

A. Diarrhea: It looked like "Crype" [the cri-pe: the fish we get from the store.] And It would be large pales of it. I wouldn't even felt like I went to the bath room!!!! [Seriously]!

Witness to this

A. Nurse Casey B. Co.I Null pg. 5.-4.

# Medical Neglect toward Additional Injury

Nurse Casey tried to justify it. So claimed, without verification and at the time, knownthat, I had a known 3rd degree burn blister ear infection for over a month: "It's proble food" I clearly explained what made it a unnicrmal and then informed how it look: "Its not normal diarrhea. It looks like cripa. Its all funny looking"

Nurse Casey: "While, I can't do anything for you.

Anything elsa?!"

Note:

It is widely know that ON Surtain Integral Nights, such as that, all who come through the enformery or stay there can hear her and CO. I Null Sexual flirtation games they. She's loud: "Stop it. Stop it. Your a bully. he hee, hee, hee, Stop it. Your a hully. "I aughing Theehee." She'll come out of the office pulling down her shirt!!!
Second: CO. I Null was the witness that Night!

page 5. - 5.

12. Mal Practise by Nursen Staff.
13. Refusal to allow medical treatment by Dr. William McKerney and Nurse Jean and Nurse Casey.

14. Forcen à Offender in à dangerous situation

by (6.s.

15. Misuse of Force by CO. [D.#1] HIPHADETICAL Sequence of Claims

- A. Misuse of Force by D. #1: after hearing me state maltiple times: "Its cool, I dint fighting No more. Come on in. Come on in, I'm not fighting!". When the door started open D. #1 reached his arm in with a can of mace and spraid me directly, deliberately, in my right eye bull!! See diagram A.
- B. Forcew & offereder in danger by D.#1, D.#2, D. #3, D.#4, D.#5, D.#6, D.#7, P.#8, D.#9: I pushed offender Emmerson to the back of the cell, I was then youked out of the cell by D#1, page 5.A.

VI. Claims I began walking to the left. I made it about three cells down when D.#1 grabed me by the arm and pulled me back to the red zone [dangerous area]. I was forced on the ground and order to: "Get down! Lay down on the ground Now!"
By D. #1. At first I was not aware of the where-Shouts of Immote Emmerson [I thought they had Gloeddy removed him from the cell I I opened my left eye and turned to look in the cell and I Saw to my totle surprise that offender Emmerson was unafferded and standing in the cell without hand cuffs on. I was being handcuffed and pinared down by D.#1 while two other CO.s Stood above me [smiling]. D.#1 was yelling: Don't move! Don't Move!!" to me [directly] repeatedly. He left me [all of them] there for Approximately I minute in that dangerous situation. See <u>Diagram B.</u> Witness to this incident

1.3-House video survalence 05/23/11, 3rd shift, of Conduct Violation 25.1

C. Assault [claim #1] and Battery [claim #2] and Failure to Protect a Offender by CO.'s. [D. #1, D.#2, D.#3, D.#4, D.#5, D.#6, D.#7, D.#8, D.#9.].

I began looking around me to see how many Co.'s was Circling me It was three [3] of them. I tilted my head to see the one infront Name tag but my vision was blurry, so I tried focusing on his face [he was grimming extremely hard . He noticed what I was doing and youk hyanked his head up fast to block my view of his face and stormed of into the cell Emmerson turned sround to be cuffed-up. They CO. Wispered Something in his left ear [I could see his jurs moving] He cuffed Emmerson. D.#1 Started to left my upper body by pulling my arms It was clear he was not tring to pick me up cruse he would let go and do It agains I my face was exposed, extremely). The D.#2 Walked Emmerson half through the Cell their pushed released him toward me. Emmerson took two step, [quick step: building momentum], and kicked me Viciously in the face. D.#2 then moved Emmerson ON by... See Diagram C.1 and C.2 page 5. C.

No one tried to stop the obvious coming assault and Battery... See Diagram C.2

- D. Failure to Report Offender Abuse by Warden Troy Steel and D#3, D.#4, D#5, D.#6, D.#7, D.#8, D.#9.
- 1) Defendants #3-#9 where present at the scenn of the planned assault and Battery. Yet wowe made a report on the act. [Rather insted of doing that they charged offender Emmerson with a rule 2.1 Mayjer assaut and through association, to cover-up what they did, thier peers, droped it is [modified it] to a 10.1 Minor assault in order to stop a investigation]. [which, if I am correct, warrents a investigation for Conspiracy, your honor]. [investigation are mandatory in rule 2.1 mayjor assaults. Not 10.1's minor assaults.]

Witness to this incident

1. D.O.C. Policy and Procedure

2. Emmerson, Issa 2.1 modication to 10.1 CDY 1

page 5. D.

1. CDV stynds for Conduct Violytion

2.) Defendant Troy steel, after receiving several kites about the incident, refused to [did nathing] investigate the situation and refused to give the name's and numbers of the officer's to be reported to the authorities. See Exhibit A and Exhibit B. [Troy Steel is the Warden of Potosi Corrections Center and is by Law [217. R. S. Mo.] to ad in the preseprose-cution of any employee, rather they be or come from Corizen or not, who violates a offender's civil protected Rights.]

3) Defendant Troy Steel Also refused, after receiving kates about medical neglect and Malpractise, refused to investigate and give the names and ID. Number's of the medical staff who violated my federal protected rights. He is fully aware of the <u>Situations</u> that happen and occurring and still chose to not do anything about it.

# E. Medical Neglect by Nurse Jean:

First and foremost:

The altercation between me and Immate Emmerson began because he throwed Boiling Hot Coffee on my page 5. E.

face. [right cheek, mouth, chin, right ear and some enterred my right ear canal]. Why, I'm not utterly sure. But through word of another offender [name unknown but the Immates call him "K.B.".] That Emmerson was told to do so by a officer. Reason to cover-up some scares on my face made by some officer who fried to murder me at a different camp: C.R.C.C. - see williamson v. Mo.D.C.

11-6019-CV-SJ-GAF.-P. I have clearly visiable scares on my left eye brow, eye lid, and left sale of my face.

One can see why he chose coffee as the weapon of chose......

Now:

I was taken to the Medical En Unit, [ER Nurse office: infermary Department], where Nurse Jean was the only nurse who examened me. She noted the bloody nose, mouth busted and bleeding. She also noted the large burn blister's bubbles on my face and mouth and behind my ear. Let she began to Slander me infront of a sqt. and Co. She stated and I good: "That's what you get! You shouldn't have done it! That's what you deserve!" I want informed that I did not do anything. After she yelled at: "I don't want to hear your lies!"

page 5.F.

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VI. Claims
She dahed some clear liquid on my lips. I changed the
Subject: This was the conversation Preport/response
  Nurse, he threw Boiling Hot Coffee on my face.
Nurse Jean: "I see" [confirmation]
me: "I can't feel my face.
Nurse Jean: "What?"
me: "I can't feel my face." My hearing, I can't hear, ether."
Nurse Jean: "I can't do snything shout!" | being deliberate
ly indeferment toward my situation ].
me: "A Cary you chesk my ear?"
Nurse Jesn: "What for?!"
me: "I can't hear..
blister inside my ear canal]. . I can't do anything about that!
Me: "Sence you can't derany thing can I go to the
   hospital!
Nurse Jean: "No!"... He's ready to go to 2-House [talking
   to the sgt.
 Sqt.: Cya he have a shower?"
Nurse Jean: ".... leah." [ she thought about it, looking
 for y reason to refuse invorder to punish me even more.].
                     page 5. G.
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Witness to this incident

- 1. Medical Record reports
- 2. D.#4 [escorting sgt.]

F. Neglection of Duties by Staff [designee officer] [ether Defendant #1-7]

No one took a photo of my [the Victom] face untle the next shift and after the injuries got severly worse, when the was suppose to have taken them before nurse Jean dabed the blood off and sent me to the Dis-seg / Ad-seg Unit. [Housen Unit-2: 2-House] By this action they to never documented the damage up close like policy and procedure and Law requires for them to do. [obvious Cover-up aftempt].

G. Medical Neglect; failer to report medical neglect; Mal Practise by nurses; Mal Practise by Dr. William & McKenney; & Refusal to allow medical treatment; Slander by medical staff:

1.) ON May 23rd, 2011, 1st Shift, Approx. Time: 11:10 pp.p.m. page 5. H.

#### VI. Clyims

I was brought to Housen Unit-2/C-wing | Cell-20 of potosi Corr. CNtr. [potosi Correctional Center], where I began to to wash the mace off my extremely numb face with my bare hands, heedless to my skin being peeled off my face because of it. I, literally, washed off my face. [my material entire right cheek area came off]!!!, [part of my mouth area too!!!]. [It was all flesh]!!!

I did not notice it at first. Imy eyes where closed. I walked over to the desk and used a sheet to pat my face dry. [that's how I dry my face]. I went to look out the window and seen my reflection and nearly screamed in panic because of what I saw. I ran to the mirror and immediately hit the

emergency button.

3) Sgt. D. #4 Cameto my cell to sever/read me my CDV 25.1. He began to smile. I requested medical emergency. Shortly after word I was escorted the ER Nurses office. Nurse Casey was the only huse there. She began to make aunappropriate comments toward me and my situation [joking and laughing] to the point I had to harshly rederie redirect her: "Nurse, Now is not the time for your

enappropriate behavior.! Could you please stop from making those comments... Thank you, ma'am.."

- 4) I started to inform her of my symptom symptoms.[?]. [Spelling may be wrong]: "I can't feel my face." my hearings gove." That's when D.#4 came in. He said: "Williamson, we forget to get a photo of your injuries. Mind if I take one now. [Nurse De Casey had already started to clean the extremely large injured area.]. I said! Yeah." He took a few picture's and left.
  - "Yesh." He took & few picture's And left.

    5.) I asked Nurse Casey is she going to seard me to the hospital. She said: "No." I asked why Not. She replied: "She ent" I can't do that." I Informed her that's what she suppose to do in this situation. She said: "No. But I'll call the Dr. to see what he want to do."
  - 6.) She left and came back and the Dr. Said put me in the infermary and he'll see me in the mourning and to give me a shot of some type of pain drug the equivalent- of-Morphine. [her and the Co. swore it would make me go to sleep. I was up all night and the next night. Up all day and night]. She was ordered also to put sometype of cream from a blue jar on my injuries page 5. J.

W. Claims

to. And rap my head up with gauze. The Dr. also
proscribed Tylenol 3 to be given to me for pain
every 4-Hours as needed. I lied and said I needed
it. I just wanted it just because it tasted good.
I was <u>numb</u> from my rightear to the left. They
could have cut me open with a chain saw and I
wouldn't have felt it!!!

T) I informed nurse Casey about my hearing loss in my right ear. She took a scope and cheaked it confirmed I kanhad a burn blister in my ear. But they stated she I can't do anything about that."

8) I ysked Isn't there I burn specialist or eyr specialist It the hospital?" She to me: "NO. There's No such thing Is I burn specialist or I est specialist." I left it at that.

9.) ON May 24th, 2011 The Dr. Came. Dr. Mckenney did not great me he said: "Lets see how the patient is doing." [weird]. Nurse Tamra removed my ganzes from my face. The Dr.s assessment was: "3rd degree burns with 2nd degree... marks. les, while, we'll put him in for skin draft's by the hospital. Until then, page 5. K.

we'll continue with the"?" cream and keep him here in the enfermary. Ah-, I think that'll do. [he started to leave].

10.) I stoped him in his tracks, immediately. I stated: Doctor, my right arm hasn't been assessed and I can't herr out of my right ear." [I showed my arm cause the Shirt I had on was big, the sleave fell over the map medical rap.]. The Dr. said: "Ch. while, let have a look. [the marse Tampa removed the gauze]. Yes, 2nd degree burn. We'll continue with appling "?" cream and changing the raps once a day. The started to leave again. The was moving pretty fast. II.) I stoped him agrin, immediately. I stated: "Doctor, there's something your engetting." Doctor asked: "what?" I replied: "my ear. I can't hear out of my right ear." The Doctor stated: "While, I can't do anything about that." I stated: Isn't there & ear specialist who can treat me. In dest in my ear. There Some of that Boiling Coffee got in my est. It sound like in I'm under water". 12) The Doctor them cut me off rudely, Stating: "Ch, I'll look at it. [ Sounding reconstirritable] He took his scope looked in my Cyr and then ghe stybed [thrusted] the burn busted blister & with it. Next thing I feel is a liquid running down page 5. L.

VI. Claims my Neck. It was pass from the large 3rd degree burn blister in my ear canal]. 13.) The Doctor them stated: "Oh. While I can't see in your, We'll just, while. OK. Anything else? I asked: Can go to the hospital?" He said: "No." I ssked: "hyh, So, your going to deny me trestment?" He stated: "Yes." I then asked: "So, your going to tefuse me trestment?" He stated: "les." 14.) He them stated: "While, we'er donie." [he left.]. From that tuesday her to that were week the Mednesday the Nurse's continued to forget to Change me medical gauze around my arm. To the point that the cream was green and brownish and slimy [disgusting, sickening, ill] 15.) and from that Tuesday, the 24th of May, 2011, I contacted a burn blisted/Eur infection. I compaine d about but all the enfermary nurses, nurse Pam, Nurse Casey, N#1, N#2, all claimed that they Couldn't do anything and that there wasn't a ear Specialist ["There's No such thing as a ear specialist. Ha ha ha ha. [laughing at me]].

VI. Claim That following week Wednesday the Doctor came to See how my face was doing. Margel Miraculously my face healed... [lips, cheek.]. [yet other symptoms related to the serious injury [trauma, insomnia, fear, angre, katered hatred, defenselessness, ect] have no Cure. Just dependency on pyschiatric medication. Which I'm on now. [Colidine and Rymron].]. The Doctor stated: "Oh, Now that just wonderful. Yes, It healed. les, that's good. OK, there still a slight discoloration, but that fine -. Here take a look Treferring to Nurse Tamra and CO. I Bremnum]. The nurse and Co. begun & giving out excessive compliments to the quack: "Great Job, Doctor! Beautiful Job! Wonderful Job, Doctor. That is amazing, Dr. Mckenney. Bea-utiful Job, doctor! "[it was a comment symphony of em ] 16.) The Doctor Stated: While, we can call off the sking drufts, and -, the patient is free to go back to Housen Unit-2" [He started to leave]. 17.) I stoped him, immediately. I stated: "execuse me dector, but, I still can't hear out of mg right ear. You haven't treated it and Now it page 5. N.

VII. Claims is infected. I have a burn blister infection or, and, a ear infection. When you poped that burn blister in my ear it got infected." He stated: "I can't de anything about that." I asked him: "So, fou telling me you can't proscribe some antibiotics or something?!" He stomped over instront of me and asked! "while, what are you ellergic to?!" [sounding irritable]. I said: "the, Tegratol." [he started to live but stated]: That pyschic meds!" quick [dismiss it as unwanted knowledge]. I then quick ly stated, [which got a result from him: a Negative result]: powsel Penicillin." 17.) The Doctor turned toward me with & hughmun lang humangus [the hugest] Smile [demonic] [& demonic grin] I proble seem. He guickly quickly turned to nurse tymry and said: "We'll start the patient on Mocicillin." and stormed out the room. Nurse Tamras face looked like she was scared. She replied: "Yes, doctor." 18.) Apon leaving Nurse Tymry popped one of the page 5.0.

VI. Claim Red Pills out but ysk CO. Hywkins did she think it would better to allow me to take it there or just let me go back to 2-House and take it there. Co. Hawking told her. "Don't isk me. It's your job." So Nurse Times pushed it back in it 30 case package and said I can take it when I get back to 2-House. 19.) I got back to 2-House and popped the pill. Tothe unaware of it nature or relation to Pericilling. I immediately begin to itch. unilike Penicillia Lwhich gives me burning, feverish itches and cley- red dots and slight swellings, Thy the way, it makes me yell and scream its byd!], Mccicilling gave me light itchs and minor red det with no swelling. Yet I couldn't stop Stratching. I couldn't fegure it out. I went to my door, and, here comes nurse Tomra laughing with & white male CO. She says - mr. Williamson, hy hy, Cyn, I have that mocicillin back," I asked: "Luhy?" She say: "ha ha, your nect suppose to have that It's related to pericillis, four ellergic to pericillis? page 5. P.

VI Claims hy hy hy. "I informed her thyt: "No wonder I'm itch so bad. And I got them red dots [I started to exam my self]. Can you please report this?" Nurse Tamra replied. Yes, can I get those meds?" I gave them back to her. I asked her: "Am & I going to get a different antibiotic?" She replied "les." She wilked off. I never received your Intibiotic Sence then. [until months later]... 20.) On Friday, June 3rd, 2011, 3rd shift, [after going to medical for medical emergences Three (3) other time because of my burn blister/ear infection symptoms [extreme pressure, popping (cracking pain), drainage]]. I did like the medical slips (patient education form) said to do: drip soapy warm water in ear, tilt, Them tilt in reverse and allow the water to drain-out. 21.) While, after I tilted the first. time, I was Screaming insamely, raming the panic button the Co.'s just called over the walky talk, cuffed me up and escorted me over to medical. 22.) Nurse Casey bersted for doing what the forms, she gave me, said do. I showed her the forms and told her: "That what you gave me." page 5. Q.

VI Claims She called the doctor. I was placed in the enfermary and given a shot of something more potent them Morphine. The needle was 4 to 5 inches long And the thing was 3/4's filled up. [all I know is pain was no long, ever, a issue]!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!! Asy I still don't fit shirt!] 23.) TO THIS DAY, YOUR HONOR, I STILL DON'T FEEL SHIT!!!!! AND I MEAN THAT!!! PERIOD! END OF DISCUSSION! 24.) I felt & SNAP and heard it when it did. And All I know is there wasn't no more prin!!! Nurse Casey said I was going to fall Isleep. I was up all through the weekend. I got 2 Hours sleep before the doctor came in to see me that Monday, May 26th, 2011. 25.) The Doctor refused to send me to the hospital again. He refused to treat me and to proscribe antibiotic's. He exclaimed: Doctor did treat patient!" When I told: "You never trested me, Dr. Mckenney." [referring to my earl. 26) He sent me back to 2-House. I staid over page 5. R.

VI. Claims in Housen Unit-2/C-wing/cell-20 with my ear draining from month after month after month. My pillow case had blood, puss stains in it to the point it was unsanitary. IT.) I couldn't sleep for days on end, and when I finally did fall asleep I would wake up, because of a electric shocking sensation that was almost unbareable would cause me to !!!" [I was placed one colidine 3mg.][I wasnit working at that time at all ]! 28.) Around August, sometime, I went in again for medical emergency blood was coming out of my car, Nurse Casey was there. I explain what was on my pillow case I had tried to fall asleep YND went to turn over and found blood drops on my pillow. See looked in my ear canal and said: "ceuw—, gross! Thats..... That's bad. Yeah, that's bad. I'm going to put you in for cloctor sick call... She sent me back to HUZI 29.) When I go to doctor sick call [I was the [13st patient seen ] the Doctor states: "Wow, 1. H.U. 2 stynds for Housen Unit 2.

page 5. S.

VI. Claims patients face look really good. [I go take a set on the operation table]. I cut stright to the chase: "Doctor, this is not about my face." He asks: While, what can I do for you mr. Williamson? I instorm him that I have had a car instection, I burn blister ear in fection in my right that he has not treat seen May 25th of that year. He immediate start exclaiming: "Doctor has treated patient! Doctor, has treated pytient!" I press forward. I continue to explaine by detail what has transpired sence both enfermory placements and release's. That no antibiotic where given and that he poisoned me with Macicilline, knowing I was ellergie to pericillin. Before I could convict every further he hope up form his desk and ysked: "While, would you like for me to look in your ear?"

I stoped and said: "Sure." 30.) He check the right them the left. [I had insform ed him when I was in the enfermary that I Could pinch my mose and blow and dir would Come gushing out me right along with pass.]
page 5.T.

VI. Claims The doctor [knowing I was hand ouff from the back] Stated, [mockingly]: "Ah, ha ha, mr. Williamson, ha, ha ha ha, could you pinch your Mose and, hy hy, pinich your." 31.) I stoped him right there: "Doctor, you know dynny while I'm hand cuff.." 32.) He exclaim: "OK, While you do have drainage in your egr. " I storted to cut him but changed the subject when notice what I was about to do. He stated: I can't do anything and [Lowering his tome and leaving close to me] Your not going to argue with me. You hear me!! 33.) I told him: One: you wever trested me! Two: your Never proseribe medication. Three: He Started Yelling: "Murse! Murse! Murse!!" He ran out of the office creating a loud uproar!! He returned with a short fat Murse [ N.#3] and & fall, cobese female Co. . He began to exclaim [slander] that he treated me and walked over to his desk and sat Endown. I then begon to explain that the 5. U.

VI. Claims Never treat me But as soon as the racist white female's heard that they both started screaming: "Oh —! Oh — NO —!!! You gotta go —!! Oh—! NO! He gotta go —!!"
They ran out of the office. That's when the doctor exclaimed: "He doesn't appreciate" Jarything !! 34.) I told that dector before I walked out: "You know your quack..."
35.) That night 8:00 meds I started receiving y untibiotic (pill) and some type of ear drops. I asked the Nurse's [N.#2, N.#4, N.#5: I think her Name is Jammy what was the ear drops. They all said "Anti-biotic". Nurse Jammy yelled at me: "I take your meds!" I refused it.

1835.) Nurse Pam lured me to trust it. It is a water substance. And alway drains out. Let on the threthird (3rd) day of taken it.

A Viscid goo came pooring out of my ear.

I woke up light head and out of it when it Come running down my should and hit my hand. It was extremely sticky and page 5. V.

Wouldn't rub off. The Nurse & N. #2, looked horrified [eye big, and couldn't speak]. I requested her to report that. She see moded her head [yes, she would]. She didn't even offer to give me any of the ear drops.

36. I refused all other medical treatment to purtaining to my ear.

H. Endangerment by 2-House Classification Staff and Sgt.

At my Dis-Seg hearing [disciplanar Hearing] I requested for P.C. [protective custody]. (asemanage II. Milam asked what for you don't have any enemy. And you can't have staff for your enemy." [weird]! I explained I know, that's per policy. But I'm down here for a fight. You should already have the immate name as a enemy." He said "Who'd you have a fight with!?" The othe casemanager present said: "That's what where teaming him on..." [convictingly]. He, C.C.MII Milam look at the paper work again said: "huh. Oh. [looked through some more paper work]. They..."

The C.C.m [looking over his shoulder, at all times. Pointing out information. I had been complaining about Defendant William Milam unifair and unjust behavior. [abuse of derdiscretion]]. Corrected him on misstytement he was deliberitly making, misspellings, dates, time. It was to the point that defendant Milam gave up tring to get dway with being unjust and unifair in front of him. At the a point, milam stated: "haha, Someone forgot to put down who you got into a fight with. So who did you get into a fight with?" [He was tring to peg me for a "Snitch."]. The other C.C.M pointed it out, to him, on 2 Sheet of paper [records]. [defendant Milam Started to get ungre: frowning, ungre face, snapingt the other Walana. Casemanager].

I requested P.C. again. Casemanager Milam said he would put me in to see the P.C. Committee. Never happen though. In sted yt my next meeting they said I failed to 2-man acclimate, and given 30 more daies Dis-seg. I requested P.C. and gave them a play by page 5. X.

play debreifing of my situation [Staff, Emmerson ect.] I was immediately placed on the status and retained 4 20-20. [single man cell]

Nitness to this

1. Attach Description hearing form

Someone altered my records after the hearing and tried to have me moved. The first time
The tried to put me in the cell with Two (2)
other offenders [it would have been three (3)
offender in a 2 man cell.] [There is not a overcrowding situation at P.C.C.]!! I showed the Sqt.
my AD-Seg form which clearly states: Retain
2 2 C-20 [That mean that I am/was not to be
moved. Period! End of discussion]. The Sqt. tried
to argue that that is not what that me. He
Started to yell at the and was about to
threaten me whe a CO. came told him! There
was a misstake someone was already assigned to that cell. He walked away with apologizing.
[weird again]!!

The next inicident They try to force me to go to medical with my every, knowing we'er to page 5. Y.

VI. Claims be seperated at all time. [No contact! Period!!][I refused to sign enemy waviors! CO. Amber Guiles [spelling may be wrong] informed me that casemanager Stated that I better go. I informed her I refused to sign every waviors whith Emmerson. She called the caseworker (C.C.M) back. She came told me that he said he'll come down to escort you to medical. I said ok." II wanted to see who the champ was. If he was going to make it that easy to sue him, I'll play slong]. He Never showed. Shortly & After that CO.s came told me pack my stuff I was being move to & 2 man cell [agains] I refused and showed them why. The sgt. came. He thresten to make me. I complied to move. I offender was who I thought it was going to be; Emmerson, Issa big Cousin: Darrie Kelly [ Now fag: Booty brandit.] He stated: You don't want to come in her Godzillah. [Godzillah is my nick Name: He respects me. But we alrerdy. We would get it on, I declared him as my every. I was put back in 20-20. [weirder!] witness to this 1. Ittached enemy request from [see date and time]

page 5. Z.

#### VI. Claims

Appropriate Authority

Here listed are the Laws and R.S.Mo., ect. which entitle me to relief. As listed:

- 1.) 217.405 R.S. Mo ... Offender Abuse: Officer shall not ...
- 2.) 217.410 R.S. Mo... Abuse of Offender: duty to report, eet...
- 3.) 217.050 R.S.Mo. ... To Sue in the Name of Director ...
- 4) 516.100. Period of limitation of prescribed
- 5.1516.120. (4) or for any other injury to the person or rights of unother, ect. [within five years]
- 6)516.130. (1) Are action against other officer(s) by the omission of an official duty.... [within three years]
- 7.) 516.140 actions within two years: Am action for libel, slander assault, battery,
- 8)516.145. All actions brought by a offender, ect. [one year]
- 9) The 8th Amendment.
- 10.) The 1st Amendment. [right to grievance]
- 11.) The 14th Constitution Amendment

Capacity Issue

I request both Capacity issues:

A. Indivigual Capacity B. Official Capacity

# .. Cont. VI. Statement of Claim: appropriate authority:

Supreme Court Section 1983 case Called: <u>Cruz v. Beto</u>, 405 U.S. 319,322 (1972) Stoles:

"Case should not be dismissed for failure to state a Claim unless it appears beyond doubt that the plaintiff can prove no set of facts in support of his claim which would entitle him to relief."

Conley V. Gibson, 355 U.S. 41, 45-46 (1957)
The Supreme Court said that in Considering a Motion to dismiss, a prose complaint should be held to less strict standards than a motion drafted by a lawyer. [The Attorney Generals Office, ect.]

### Title 42

42 USCS \$ 1997e Suits by Prisoners

I.E. Particular Circumstances Constituting Exhaustion: 173 Inaction by prison officials

Claim:

Lorr. Cour., 2 House / C-wing/20 cell on June 15, 2011. She refused my request for 4 but gave me one (1). I failed it under Retailatory Act by staff. No one responded so that I could appeal it as required to exhaust occording to P.L.R.A.

page 🗯 B

Cont. II (appropriate authority Continuence)

2. I listed in the complaint:

1. Offender Abuse

2 failure to report Abuse of Offeder

3. Mal Practise

4. Refusal to treat patient by Dr. William Mckinney

all the requirements for a <u>Emergency Carievance</u> contains to be responded to by staff with-in I daies in occordence with 05-3.2 Offender Carievance
TH. G. 1. 4. D. (1), C., e.

Case in Support: Taylor V. Barnett (2000, ED 4a) 105 F. Supp 2d. 483.

I declare under the penalty of perjury that the foregoing is true and Correct. Executed at Bonne Terre, MU. Date: June 24th, 2011

Lament Williamson

#### VI. Claims

Diagrams

Diagram A.: misuse of Force

Bunk Beds Chair

The Co. Noticed that I was compling but still apraied me regardless.

Two property buckets stacked on top of each other. which I was pinned down in a siting position and could not move.

me:

I had offender Emmerson, Issa in a head lock because he was still hostile and strugllen.

Inmate Issa Emmerson.

Diagram B.:
The Cell Door is fully open

Jud Emmerson is fully unathended
by the Correctional Officers. I

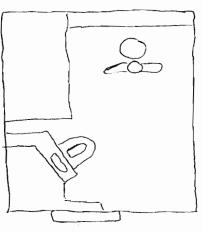
was forced to lay there as they

allowed Emmerson ample time to

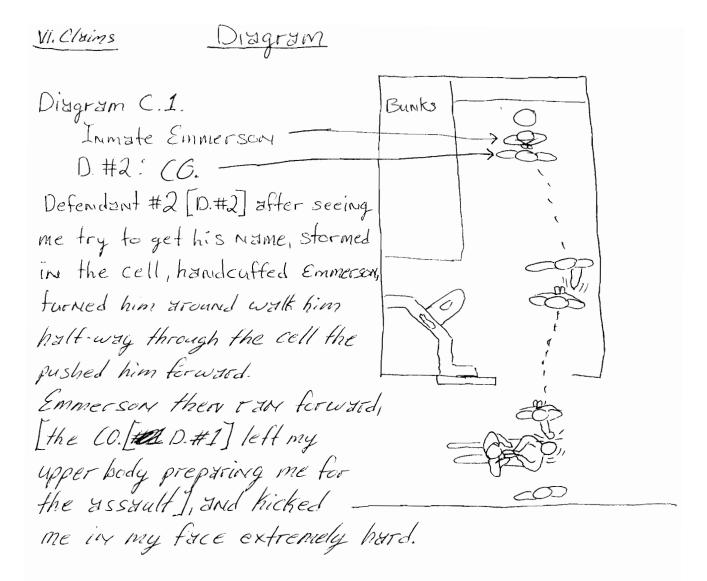
Come out and begin to assault me.

This was done deliberately by the Co.s.

Page 1 of 3







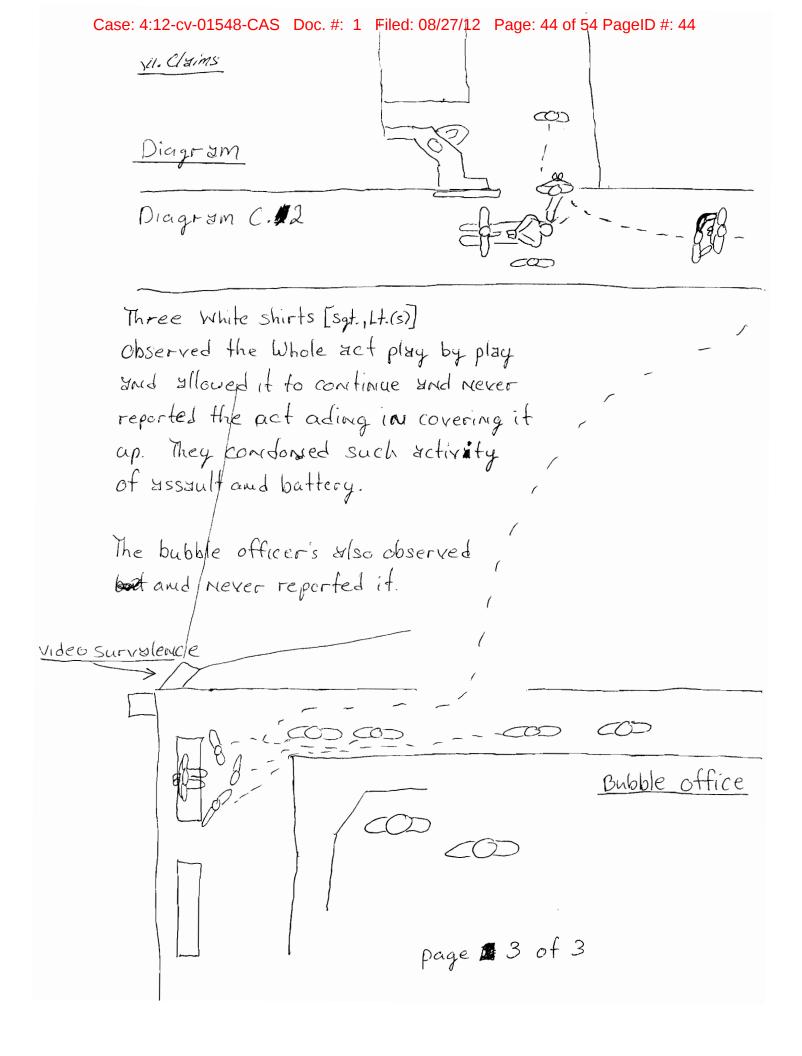
No one tried to stop the obvious plan and execution of the planed assault.

It was lis very clear that this assault was not placed planned or conceived by offender

Issa Emmerson. Video Survalence caught it all

on tape

page 2 of 3



## VI. Statement of Facts Definitions

D.1: Most of the defendants will be numbered do to the Wardens refusal to assist in bringing those quilty of violating my Civil protected rights to the courts immediate awareness Causing him to be a defendant also as proscribed by law.

D. 2: Correctional Officers who violated my civil protected right will be numbered by who violated them first [1st] to Last. And will be the indicator of that one indivigual throughout this evidentary hearing untle the Attorney Generals Office and the Department Of Corrections Comply with R.S.MO.

217. Law to give up the identification of the perpetrator.

Those numbers are:

D.#1, D.#2, D.#3, D.#4, D.#5, D.#6, D.#7

D.#8, D.#9. page 1 of 3

VI. Stylement of Facts D.3: The Nursen Staff that are not Named Will be numbered also untle the Department Of Corrections Comply with Lyw 217. R. S.MO. duties: 2. At the current moment Potosi Correct ional Center Warden refuses to The Nurse's Numbers are: N.#1, N.#2

D.4: There are five locations where these, Continued, related violations persisted to occur. Those Locations are:

1. 3-House [Housen Unit-3/B-wing/top walk.

2. ER/infermory Nurses office/room-1 3. 2-House/C-wing/ce/1-20 4. Medical Department/Dr.s Office

5. Potosi Correctional Center, 11593 State Hwy. 0, Mineral Point, MO. 63660. [ any other place on or from I transporting from that location [ [transport van, transporting office build, ect.]. page 2 of 3

### V.L. Statement of Facts

D.5: Department of Corrections Policy and Procedure Manual Table of Contents are a index of the D.O.C.'s quidelines and reference to employee's information and programs avialable and investigation requirement standards obligation. Some of which are prohibited to offender's reviewal or requests. Such as:

D.1-12.1 Serious Incident Reporting Ind Debriefing Sessions ... 09/05/02 prohibited

D2-14.1 Staff Identification. 12/10/08.

See Table of Content

D.G: Offenders are only allowed to know Correctional Officers and Nurses Last Name. It is just by consequents that one get a public employees first and Last Name or just the first Name. Most of the time we offenders don't even get ether Name.!

page 3 of 3

	<b>V</b> 11.	KEEIEI
		State briefly and exactly what you want the Court to do for you. Do not make legal arguments. (Note: If you are a state prisoner and you seek from this Court relief that affects the length or duration of your imprisonment, your case must be filed on a § 2254 form.)
		1.) Referral for Prosecution of all defendants ellegable 2) Restrains
		order on defendant [will later be defined when concil can be appointed
		3.) Investigation of my record and for Adjustments/expongences to be made
		4) Termanation [permanently] of all ellegable defendants
		4) Termanation [permanently] of all ellegable defendants  Grant punitive and  5.) Special placement 6.) Out-Count Medical assistents 7.) Be monetary Damages  (see below)
	VIII.	MONEY DAMAGES:
		A) Do you claim either actual or punitive monetary damages for the acts alleged in this complaint?
		YES ™ NO □
		B) If your answer to "A" is YES, state below the amount claimed and the reason or reasons you believe you are entitled to recover such money damages:
		Base on ground, as required by and set-forth in R. s. mo: 1.) Defendants Enforced
5.) Mal Practise	me to llow m	be assaulted by Offender 2) Refusen to treat my injuries by defendant.  redical treatment by Defendants 4.) Mal Practise by Defendants [Dr.]  fendants[murse] 6) Derelection of Duties by All defendants
		Do you claim that the wrongs alleged in the complaint are continuing to occur at the present
		time?
		YES [>] NO [ ]
	Lame	ont Williamson
		ID NO. #36 39 30
;	Signatu	re of attorney or pro se Plaintiff(s)  Date

In the United States Di	strict Court of the Eastern	District
	Barrot Missouri	
Mr. Williamson #363930 De Plaintife	6)	
V.	3 Civil No.	
Mo. D. O. C. etal.,	) Declaration/request	

I, Lamont Williamson, plaintiff, hereby declare that plaintiff has studied as far as his concerns (issues) and this Courts govern law covers and hereby request activation of Federal Rule of Evidence Rules. As listed:

- 1. Rule 201. Judical Natice of Adjudicative Facts Lunen appropriate]
- 2. Rule 105 Method of Proving Charater: (2), (b)

[Citations Omitteed]

(1.) Defendants MCD.O.C. and its employees are heterosisty
Stained with Conduct hiolations and Violations against
the Constitutional Amendment and Inmates) Rights that
Can Not go unnuticed when it comes to preliminary
questions and Ultimate Issue(s) needing to be address.

[Plaintiff is a Offender and is restricted from having such
thistory records of the Department of Corrections Molations].

[The defendants hold such proof us while as Missouri Court
records].

3. Rule 406. Habit, Routine Practice
[Plaintiff is restricted from haveing such Policies and Procedures wherefore defendants hold all pevidence in occurrence with RS.mo, guidelines. I get some are not restricted].

4. Rule 501, General Rule

5. Rule 704 Opinion on Ultimate Issue

C. Rule 803. Heursay Exceptions: Availability of Declararit
Immorterial (1)-(7), (15)

7. Rule 901. Requirement of Hathentication or Identification

8. Rule 1001. Articlex. Lowtent of writing, Recording, Photographs 9. Rule 1002. Requirements of Criginal

10. Rule 1006. Summaries

Lastly,

Federal Rule of Evidence:

Article I. Rule 104. (6)

When we the relevancy of evidence depends upon the fulfillment of a Condition of fact, Court shall admit it upon, or subject to, the introduction of evidence sufficient to support a finding of the fulfillment of the condition.

[Citations Omitteed 1-10]

Wherefor these rule requested stand FRE enforcem state law and FRE the guideing and primal law of civil proceeding herein the Eastern District Court of Missouri and being applicable to be noticed by this Court ether of its descretion or apon request, within mean of timely measures, may be used in its ethical form of law to admiss any evidence not noticed by ether party in favor of plaintiff, being that plaintiff is the requester of such advantage admissible and available.

I declare under persalty of perjusy that the foregoing is true and correct. Executed at Mineral Point on

Respectfully Submitted Lamont Williamson Pro Se, Inmate ID. NO. #363930 P.C.C. 11593 State Hay. Co Minieral Point, 110.63666 RECEIVED AS MAIL

I Lamont Williamson, plaintiff, declare that:

I was sent my complaint in a "return to send"

package on Aug. 22nd, 2012. I sent it to the Court

of Appeals because that's the oddress the Law

Clerk at E.R.D.C.C. Law Library gave me. This

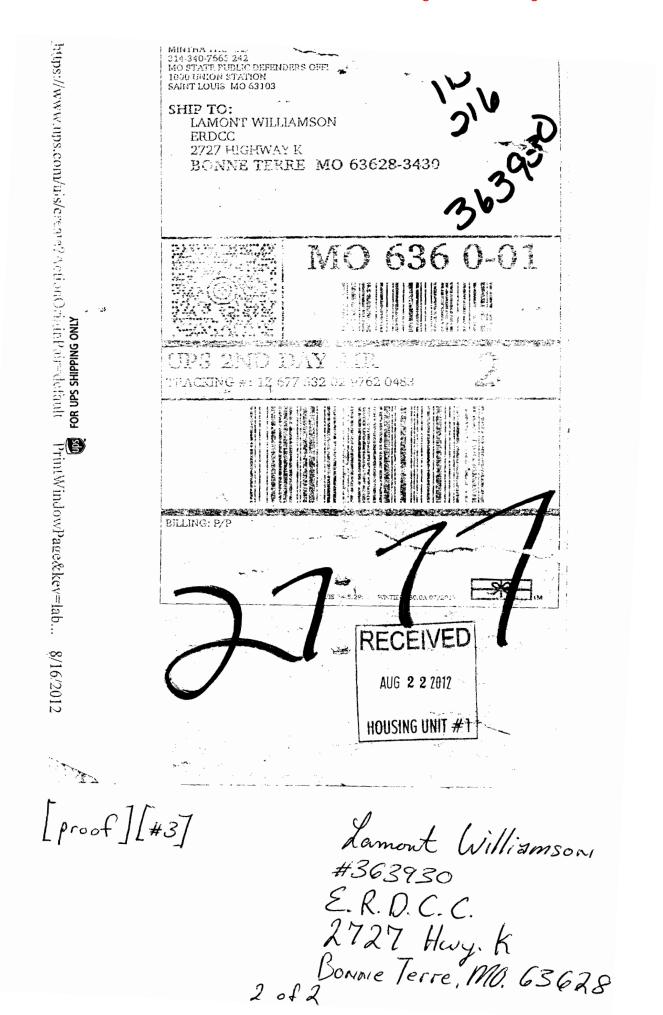
sould not count against me. It would be unfair

and a abuse of discretion.

I, Lamont Williamson, #363730, declare under the penalty of perjury that the foregoing is true and Correct. Executed at Bonne Terre, MO. 63628 Date: Aug. 22nd, 2012

Lamont Williamson

[proof #1 and #2]



In The United States District Court For The
Esstern District Of Missouri
Division
Civil Action, File No.
Lamont Williamson ID No.#363930.
V. Plaintiff, J Summons
Director of the Missouri Deat of Corrections.
Civil Action, File No
To the above-Named defendants:
You are hereby, Summored and required to serve upon
plaintiff's attorned, whose address 13:
promote a date as 15.
AN ANSWER to the complaint which is here with served
an answer to the complaint which is here with served upon you. Within 60 day's after service of this Summons
upon you, within 60 day's after service of this Summons
upon you, within 60 day's after service of this Summons upon you, exclusive, of the day of service. If
upon you, within 60 day's after service of this Summons upon you, exclusive, of the day of service. If
upon you, within 60 day's after service of this Summons upon you, exclusive, of the day of service. If you fail to do so, Judgement by Default will be taken against you for the relief demanded in
upon you, within 60 day's after service of this Summons upon you, exclusive, of the day of service. If
upon you, within 60 day's after service of this Summons upon you, exclusive, of the day of service. If you fail to do so, Judgement by Default will be taken against you for the relief demanded in the complaint.
upon you, within 60 day's after service of this Summons upon you, exclusive, of the day of service. If you fail to do so, Judgement by Default will be taken against you for the relief demanded in the complaint.  [Seal of the U.S. District Clerk of Court
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